

TODD KIM, Assistant Attorney General
 S. JAY GOVINDAN, Section Chief
 BRIDGET K. MCNEIL, Assistant Section Chief
 SAMANTHA G. PELTZ (IL Bar No. 6336536)
 U.S. Department of Justice
 Environment and Natural Resources Division
 Wildlife and Marine Resources Section, Natural Resources Section
 P.O. Box 7611
 Washington, DC 20044
 Tel: (202) 353-5959 (Peltz)
 Fax: (202) 305-0275
 Email: Samantha.Peltz@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ANIMAL WELLNESS ACTION, a non-
 profit corporation, CANA FOUNDATION,
 a non-profit corporation, THE CENTER FOR
 A HUMANE ECONOMY, a non-profit
 corporation, LAURA LEIGH, individually, and
 WILD HORSE EDUCATION, a non-profit
 corporation,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
 INTERIOR, BUREAU OF LAND
 MANAGEMENT, and JON RABY,
 Nevada State Director of the Bureau of Land
 Management,

Defendants.

Case No: 3:22-cv-00034-MMD-CLB

**ORDER GRANTING JOINT
 STIPULATION TO EXTEND THE
 DEADLINE FOR FILING A
 MOTION FOR ATTORNEYS' FEES
 AND COSTS**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation, the Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants United States Department of Interior, Bureau of Land Management ("BLM"), and Jon Raby, in his official capacity as Nevada State Director of the BLM, (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the time to file any motions related to attorneys' fees and costs 60 days, until June 11, 2024. In support of this request, the Parties declare:

1 WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties'
2 cross-motions for summary judgment. ECF No. 81.

3 WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF
4 No. 82.

5 WHEREAS, the deadline to file a motion for attorneys' fees and costs under Fed. R.
6 Civ. P. 54(d)(2)(B)(i) is April 12, 2024.

7 WHEREAS, the Parties agree that additional time is needed to explore the settlement
8 of attorneys' fees and costs.

9 WHEREAS, this is the first stipulation for an extension of time to file a motion for
10 attorneys' fees and costs.

11 WHEREAS, it is well-established that the court has the inherent power to "control the
12 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
13 and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
14 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
15 863-64 (9th Cir. 1979).

16 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
17 AND THE COURT ORDERS, AS FOLLOWS:

- 18 1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
19 and costs is extended from April 12, 2024, until June 11, 2024.

20 IT IS SO STIPULATED.

21 Dated: April 10, 2024

Respectfully submitted,

22 TODD KIM
23 Assistant Attorney General
24 U.S. Department of Justice
25 Environment & Natural Resources Division
26 S. JAY GOVINDAN, Section Chief
27 BRIDGET K. MCNEIL, Assistant Section Chief

28 /s/ Samantha G. Peltz
SAMANTHA G. PELTZ, Trial Attorney

(IL Bar No. 6336536)
Natural Resources Section
Ben Franklin Station
P.O. Box 7611
Washington, D.C. 20044
Tel: (202) 353-5959
Samantha.peltz@usdoj.gov

Of Counsel:
Janell M. Bogue
U.S. Dep't of the Interior
Office of the Solicitor
Pacific Southwest Region

Attorneys for Federal Defendants

/s/ Danielle M. Holt
Danielle M. Holt
(Nevada Bar No. 13152)
DE CASTROVERDE LAW GROUP
1149 S Maryland Pkwy
Las Vegas, NV 89104
(702) 222-9999
danielle@decastroverdelaw.com

/s/ Jessica L. Blome
Jessica L. Blome
(Cal. Bar No. 314898, admitted pro hac vice)
J. RAE LOVKO
(Cal. Bar No. 208855, admitted pro hac vice)
GREENFIRE LAW, PC
2748 Adeline Street, Suite A
Berkeley, CA 94703
(510) 900-9502
jblome@greenfirelaw.com
rlovko@greenfirelaw.com

Attorneys for Plaintiffs

IT IS SO ORDERED:



Hon. MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

DATED: 4/11/2024